

NOTICE OF OBJECTION TO CONFIRMATION

Weichert Financial Services has filed papers with the Court to object to the Confirmation of the Chapter 13 Plan.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to object to the Confirmation of the Chapter 13 Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

1. File with the Court an answer, explaining your position at:

**Clerk  
U.S. Bankruptcy Court  
402 E. State Street  
Trenton, New Jersey 08608**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Jennifer Novick, Esquire  
400 Fellowship Road, Suite 100  
Mt. Laurel, New Jersey 08054-3422

Albert Russo, Trustee  
1 AAA Drive, Suite 101  
Robbinsville, New Jersey 08681

2. Attend the hearing scheduled to be held on September 23, 2008 in the Trenton Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court  
402 E. State Street  
Trenton, New Jersey 08608**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: August 18, 2008

/s/Jennifer Novick, Esquire  
PHELAN HALLINAN & SCHMIEG, PC  
400 Fellowship Road, Suite 100  
Mount Laurel, NJ 08054

**File No. DM-120**

Phelan, Hallinan & Schmieg, PC

400 Fellowship Road

Mt. Laurel, NJ. 08054

Telephone Number (856) 813-5500

FAX Number (856) 813-5532

Weichert Financial Services

By: Jennifer Novick, Esq., (JN2743)

In Re:

DAWN K. WOLFF

Debtor(s)

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
TRENTON VICINAGE

Chapter 13

Case No.08-23608-MBK

Hearing Date: September 23, 2008

The undersigned, Phelan Hallinan & Schmieg, PC, attorneys for Secured Creditor, Weichert Financial Services, the holder of a Mortgage on debtor(s) residence located at 54 5th Street, Old Bridge, New Jersey, New Jersey, hereby objects to the Confirmation of the debtor(s) proposed Chapter 13 Plan on the following grounds:

1) Debtor(s) Chapter 13 Plan proposes to pay Weichert Financial Services \$22,200.00 in pre-petition arrears, however, Weichert Financial Services's Proof of Claim lists the pre-petition arrears at \$34,260.69. This is a difference of \$12,260.69. This difference spread over the debtor's 60 month plan would require the debtor to pay an additional \$204.34 per month. Debtor's schedule "J" shows disposable income of \$864.00. Debtor's plan proposed to pay \$1,000.00 per month to cure debtor's estimate of arrears. Therefore, Debtor's plan as proposed is not feasible and should be denied.

2) Regarding paragraph three (3) of debtor(s) Chapter 13 Plan as it relates to the regular monthly payment amount (outside plan), Debtor(s) monthly post-petition mortgage payment amount is subject to change in accordance with the terms of the note and mortgage.

WHEREFORE, Weichert Financial Services respectfully requests that the Confirmation of Debtor(s) Plan be denied.

/s/ Jennifer Novick, Esquire  
PHELAN HALLINAN & SCHMIEG, PC  
400 Fellowship Road, Suite 100  
Mount Laurel, NJ 08054

Dated: August 18, 2008